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15 **UNITED STATES DISTRICT COURT**  
16 **CENTRAL DISTRICT OF CALIFORNIA**

17 ANITA WHITE, et al.,  
18  
19 Plaintiffs,  
20 vs.  
21 EDEBITPAY, L.L.C., et al.,  
22 Defendants.  
23

**CASE NO. 11-cv-06738-CBM (FFMx)**

HON. CONSUELO B. MARSHALL

**DECLARATION OF JONATHAN  
CARAMEROS (CLAIMS  
ADMINISTRATOR)**

Final Approval Hearing:

Date: October 9, 2013

Time: 3:30 p.m.

Courtroom No.: 2

1 I, Jonathan D. Carameros, declare as follows:

2  
3 1. I am a Senior Managing Consultant with KCC Class Action Services,  
4 LLC ("KCC"). Pursuant to the Court's May 20, 2013 Order Certifying Settlement  
5 Class and Preliminarily Approving Class Action Settlement ("Preliminary Approval  
6 Order"), KCC was appointed as the Settlement Administrator in this action and  
7 charged with disseminating notice to the settlement class and administering the  
8 settlement. [Doc. #80, at ¶ 7.]

9 2. On August 2, 2013, I executed a declaration setting forth my personal  
10 knowledge of the actions taken by KCC with respect to the settlement as of that date.  
11 [Doc. #82-3.] In that declaration, I set forth: (i) KCC's publication of summary  
12 notice in USA Today [Doc. #82-3, at ¶¶ 2-3]; (ii) KCC's emailing of summary notice  
13 [Doc. #82-3, at ¶¶ 4-5; (iii) KCC's creation and maintenance of the settlement  
14 website [Doc. #82-3, ¶¶ 6-7]; and (iv) KCC's establishment of a post office box to  
15 receive exclusions, objections, notices of intent to appear and any other  
16 communications from settlement class members. [Doc. #82-3, ¶ 9.]

17 3. The purpose of this declaration is to set forth my personal knowledge  
18 regarding the total number of claims, exclusion requests, and objections received by  
19 KCC in this action prior to the Final Approval Hearing.

20 4. On or about May 30, 2013, in order to accommodate inquiries regarding the  
21 settlement, KCC made operational a telephone number, 1-855-282-8113, with an  
22 Interactive Voice Response ("IVR") system. Callers have the ability to listen to  
23 important information about the Settlement and to request a copy of the Claim Form  
24 and Class Notice 24 hours a day, 7 days a week. As of October 7, 2013, KCC had  
25 received 264 calls to the IVR. KCC has and will continue to maintain and update the  
26 IVR throughout the administration of the Settlement.

27 5. On or about May 20, 2013, KCC established a post office box for receiving  
28 requests for exclusions, objections, notices of intention to appear, and any other  
communications at: KCC Class Action Services, P.O. Box 43167, Providence, RI

1 02940-3167.

2  
3 6. The deadline for settlement class members to submit claim forms was  
4 August 26, 2013. As of October 7, 2013, KCC has received 1,744 timely claims  
5 either via U.S. mail or through the online claim form. As of October 7, 2013, KCC  
6 also received 13 claims that were submitted after the August 26, 2013 deadline. Of  
7 the 1,744 timely claims, 29 were duplicative of another timely claim; as a result,  
8 KCC has received 1,715 timely unique claims.

9 7. Pursuant to the Preliminary Approval Order, the deadline for settlement  
10 class members to file a Request for Exclusion was August 9, 2013. [Doc. #80, at ¶  
11 10.] As of October 7, 2013, KCC has received no Requests for Exclusion from the  
12 class settlement.

13 8. Pursuant to the Preliminary Approval Order, the deadline for settlement  
14 class members to file an objection to the class settlement was August 9, 2013. [Doc.  
15 #80, at ¶ 10.] As of October 7, 2013, KCC has received no objections to the class  
16 settlement.

17 9. As detailed above and in the August 2, 2013 Declaration, KCC has  
18 completed dissemination of the Class Notice pursuant to the Settlement Agreement,  
19 has processed and continues to process claims, and has maintained and continues to  
20 maintain and update the Settlement Website. KCC's fees and expenses up to  
21 September 1, 2013, are approximately \$85,105, which primarily includes fees and  
22 expenses associated with implementing class notice, but also includes fees and  
23 expenses associated with updating and maintaining the toll-free telephone number  
24 and Settlement Website, as well as handling email bouncebacks and processing  
25 claims.

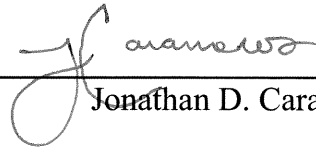
26 10. KCC will continue to administer the settlement pursuant to the  
27 Settlement Agreement, and is prepared to make timely distributions for approved  
28 claims and handle all related follow-up through closure of this matter. Based on  
projections from similar settlements, KCC estimates its remaining fees and expenses  
will be approximately \$14,700. The actual administration fees and expenses incurred

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1 will depend on a number of variables, including but not limited to, the number of  
2 claims ultimately processed, calls received, and checks mailed.

3  
4 11. KCC has complied with the terms of the Settlement and the Court's  
5 Order. Use of online claim forms and traditional methods for publication notice  
6 maximized the dollars spent to contact potential members of the Class. The details of  
7 the class notice program, including the methodology underlying its design, were  
8 explained in detail in my declaration filed in Support of Motion for Final Approval.  
9 [Doc. #82-3.] That declaration is expressly incorporated herein by reference.

10 I declare under penalty of perjury of the laws of the United States of America that  
11 the foregoing is true and correct, executed on October 8<sup>TH</sup>, 2013 in Novato, California.

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Jonathan D. Carameros